

**FILED**

**APR 13 2016**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. **4:16CR00157 AGF/DDN**

SHAUN R. HAYES,

Defendant.

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and James E. Crowe, Jr., Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

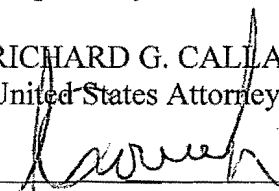
As and for its grounds, the Government states as follows:

1. There is a serious risk that the defendant will flee.
2. The defendant is a threat to the community.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

  
JAMES E. CROWE, Jr., #23196MO  
Assistant United States Attorney